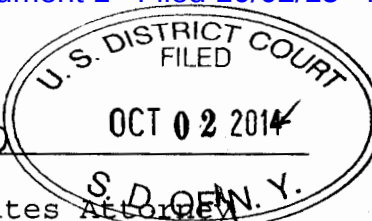


Approved:

Frank J. Balsamello
FRANK J. BALSAMELLO
Assistant United States Attorney



ORIGINAL

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Before: THE HONORABLE MICHAEL H. DOLINGER
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violation of
18 U.S.C. § 1021(a)(1)

CHRISTOPHER A. SANTELLAN MAIGUA,

: COUNTY OF OFFENSE:
: NEW YORK

Defendant.

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SOUTHERN DISTRICT OF NEW YORK, ss.:

SARIFE MURPHY, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation and charges as follows:

COUNT ONE

1. On or about October 1, 2015, in the Southern District of New York and elsewhere, CHRISTOPHER A. SANTELLAN MAIGUA, the defendant, unlawfully, willfully, and knowingly seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away and held for ransom and reward and otherwise a person, and in so doing willfully transported said person in interstate commerce, to wit, SANTELLAN forced a seventeen-year-old minor with whom he had recently ended a romantic relationship ("Victim-1") into a van and drove Victim-1 against Victim-1's will from New York to Maryland.

(Title 18, United States Code, Section 1201(a)(1).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). This affidavit is based upon my personal participation in this investigation, as well as my conversations with other law enforcement agents and my examination of reports

and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. From my conversation with a law enforcement officer who interviewed Victim-1 and my review of reports prepared by other law enforcement officers, I have learned the following, in substance and in part:

a. On or about the morning of October 1, 2015, at approximately 7:00 a.m., Victim-1 was walking to school in Queens, New York, when CHRISTOPHER A. SANTELLAN MAIGUA, the defendant, driving a white van (the "Van"), approached Victim-1.

b. SANTELLAN exited the Van, grabbed Victim-1's belongings, including Victim-1's backpack, and threw them in the back of the Van. SANTELLAN then started screaming at Victim-1, grabbed her jacket and hair, and forced Victim-1 into the passenger seat of the Van. When Victim-1 was inside, SANTELLAN locked the Van doors.


c. For approximately eleven hours, SANTELLAN drove, at times erratically, with Victim-1 in the Van. SANTELLAN took Victim-1 through the Southern District of New York and across several state boundaries, eventually stopping at approximately 6:00 p.m. in the vicinity of a small airport in Prince George's County, Maryland.

d. During the eleven-hour drive, Victim-1 repeatedly asked SANTELLAN to let Victim-1 go or bring Victim-1 back to New York, but SANTELLAN refused. SANTELLAN also kept the doors of the Van locked and denied Victim-1 access to Victim-1's cellular phone. Using Victim-1's cellular phone, SANTELLAN responded to text messages from Victim-1's current romantic partner, saying in substance and in part, "[S]top fucking calling or watch what's gonna happen to her that's what she gets for being a stupid bitch," and "If you call the cops watch what's gonna happen to her. I was nice enough to let you see she's okay."

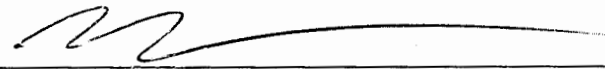
e. For most of the day, it was physically impossible for Victim-1 to exit the Van because the Van was in motion on interstate highways and other roads. Even when SANTELLAN stopped the Van to refuel or get food, Victim-1 did not feel

free to leave. Victim-1 had never traveled in New Jersey, Delaware, and Maryland, and did not know where SANTELLAN had taken them or how to get home. Victim-1 was scared and had no means of communication with friends or family and no means of transportation back to New York. Moreover, Victim-1 feared for Victim-1's safety because SANTELLAN has physically abused Victim-1 in the past.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of CHRISTOPHER A. SANTELLAN MAIGUA, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.


Special Agent Sarife Murphy
Federal Bureau of Investigation

Sworn to before me this
2nd day of October, 2015


THE HONORABLE MICHAEL H. DOLINGER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK